



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
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September 7, 2020

By ECF

The Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Jones et al. v. United States Postal Service et al.*, 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents defendants in the above-captioned matter challenging the operations of the United States Postal Service. We write respectfully on behalf of the parties to request (1) that the maximum length of defendants' opposition brief to plaintiffs' motion for a preliminary injunction be extended by ten pages to forty pages, ECF No. 19, and that the maximum length of plaintiffs' reply brief on that motion be increased by ten pages to twenty pages and (2) that the deadline for plaintiffs to submit their reply brief be extended by one day from September 9, 2020, to September 10, 2020. This is the second request for leave to file excess pages and the second request for an extension of the briefing schedule on plaintiffs' motion for a preliminary injunction. *See* ECF Nos. 14, 16. The Court granted these prior requests. *See* ECF Nos. 15, 17. All parties consent to the present request.

We apologize for submitting these requests after Your Honor's two-day advance requirement for extension requests has passed, but made these requests as soon as we determined the volume of response required by plaintiffs' submission in this expedited matter. Additional pages are necessary because the facts and issues presented by this case are complex and wide-ranging. In particular, USPS is a large, complicated organization, and plaintiffs' allegations address many aspects of its operations. The government needs an additional ten pages (for a total of up to forty pages) to adequately address the issues for the Court. Plaintiffs' counsel anticipates needing an additional ten pages, as well as an additional day for preparation, to adequately reply to the government's submission.

The parties thank the Court for its consideration of this submission.

Respectfully submitted,
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cc (by ECF): Counsel of Record